



ECCO 2006

Sandia Import/Export Control Awareness Presentations

May 2006



Presentation

- ① **Training – EC100**
- ① **Specific Training**
 - ① **Program/Center/Department**
 - ① **Software**
 - ① **Procurement**
- ① **Questions**



Training

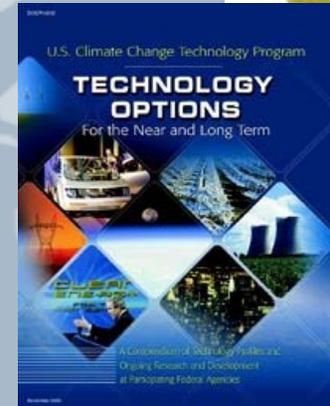
- Export Control Awareness Training, (EC100)
- Foreign Corrupt Practices Act, (FCPA100)
- Managing Contracts Effectively: For Requestors and SDRs (SBS700)
- Plan Ahead, Plan Ahead, Plan Ahead**





EC100 - Export Control Awareness Training

- ⦿ All who participate in international interactions by any means
- ⦿ Every 12 months thereafter
- ⦿ A series of modules
- ⦿ No end-of-course exam
- ⦿ End-of-module questions will be graded to 100%
- ⦿ 30 to 60 minutes - Corporate time charge
- ⦿ LMC basic content (copyrighted)
- ⦿ Sandia supplemented information
- ⦿ Manual option w/ end-of-course exam





EC100 - Export Control Awareness Training

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EC100 - Course Content - Microsoft Internet Explorer

Address: https://hrprod.sandia.gov/cfdocs/hris/OLGA/templates/c_content.cfm?session_num=3099998&module_num=446&page=38&page_num=3891&dir=next&page_start_time=17:23:39



CPS-310: Export/Import Controls and Compliance, addresses key aspects of export control and requires every employee to comply with all Export and Import laws and regulations of the U.S. and each foreign country in which we operate, except to the extent the law of a foreign country is inconsistent with U.S. law.

This policy defines the roles and responsibilities of our Export/Import employees, requires the use of Export/Import Compliance and License Processing System (ECLPS), and requires that only corporate approved Freight Forwarders/Customs Brokers be used.

SANDIA CONTACTS

EXPORT CONTROL GLOSSARY

Content Questions?
Contact [Steve Sultemeier](#)

Computer questions?
Contact [CCHD](#)
(845-2243)

Last Updated Date 1/4/06

 **Import/Export control authority at SNL resides with the following offices:**

Type of Import/Export	Review/Approval Authority
Commodities (defined as equipment, materials, and supplies other than software or technology)	<p>Import/Export Control Analysts (IECAs) at SNL/NM or SNL/CA.</p> <p>ALL international shipments and handcarried items for permanent export will be processed through the WebShipper system. ALL international commodities that will be handcarried for temporary use on one trip will process an International Handcarry Form (SF 6951-IHF).</p> <ul style="list-style-type: none"> Individuals who handcarry commodities, technical data/information, or software/computer code for a temporary period of time on international travel will complete SF 6951-IHF, International

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EC100 - Export Control Awareness Training

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LOCKHEED MARTIN
EXPORT CONTROL

Additional Examples of Export Regulations:

- The approval of the Directorate of Defense Trade Controls must be obtained before defense services may be furnished. In order to obtain such approval, the U.S. person must submit a proposed technical assistance agreement to the Directorate of Defense Trade Controls. The technical assistance agreement may not enter into force without the prior written approval of the Directorate of Defense Trade controls
- Export licenses and agreements are issued for a specific time period, but can be rescinded by the Government at any time. Once a license or agreement has expired, no further activity may occur under that authorization. If the program is not completed prior to expiration, a new authorization is required



Content Questions?
Contact [Steve Sultemeier](#)

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Shipping or transferring any item out of the country requires appropriate documentation and approval. Every physical export situation is different. Export controls apply to **all** items being exported from the U.S., regardless of where the item was manufactured.

U.S. EPA regulations require Sandia to report chemicals imported and exported by Sandia when the chemicals are regulated under certain sections of the Toxic Substances Control Act (TSCA).

The best way to comply with possible restrictions is to plan your activities as soon as possible in advance of any proposed shipment.

1. Early in the life of a new program, ask the question "Will I be exporting **any** commodities or technologies?"

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EC100 - Export Control Awareness Training

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Export Authorizations

1. Once a license is obtained for exporting certain equipment, and all of the equipment on the license has been exported, there is no need to obtain additional licensing authority to export the same equipment in the future. True or False?



- a) True
- b) False

2. You want to handcarry a computer and software that is classified as ITAR controlled to a U.S. military base in Europe. Is this an export?

- a) No. This is not an export because the military base is considered to be U.S. soil and the items will only be used by U.S. citizens.
- b) Yes. This is an export because I will be carrying the items on foreign soil on my way to the U.S. military base. Since the items will be taken outside the United States, they are considered to be an export.

3. Why do you need to document handcarrying your laptop or other electronics to a foreign country?

- a) Bringing the goods back into the U.S. will be easier.
- b) There is no need to document handcarried items.
- c) Property Management User's Manual requires it.
- d) Both a) and c)

4. You want to export a high-speed, Japanese-made oscilloscope to Israel. Do export controls still apply?

- a) No, export controls apply only to U.S.-made products.
- b) No, high-speed oscilloscopes are available on the open market.
- c) Yes, country of manufacture doesn't matter.
- d) Yes, all items sent to Israel require export licensing.

5. You have an item that absolutely needs to be given to foreign collaborator. You have been working for this individual for several years under a contract and your funding agency wants the work completed without delay. You are making a trip to visit this person, so you want to handcarry the item. What should you do?

- a) Complete an International Handcarry Form.
- b) Complete a Web Shipper and take the item even if the Web Shipper has not yet been approved by the Import/Export Control Office.

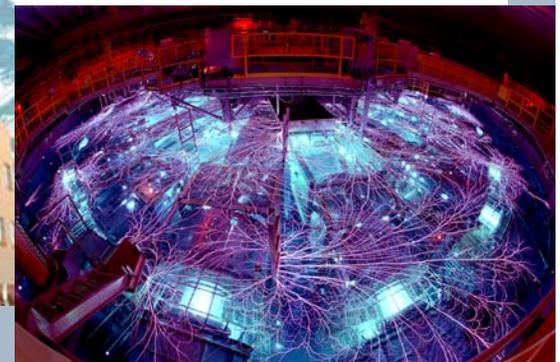
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Foreign National Requests

- Define Purpose
 - Provide complete information
 - Do not assume we will remember previous requests
 - Recommend you identify equipment that will be used by the foreign national
- No Acronyms





Review & Approval

- CPR 400.2.20
 - SME responsibility prior to release - Controlled vs. Public
 - Assistance/Consultation w/Classification
 - TWO Options
 - Formal - Electronic
 - Programmatic – DC & SME

- CPR 400.3.3
 - When ECI, mark OOU
 - Transmitting
 - Notify Recipient

OFFICIAL USE ONLY	
<u>May</u> be exempt from public release under the Freedom of Information Act (5 U.S.C. 552), exemption number and category <u>Statutory</u> Exemption #3 Export Controlled Information.	
Department of Energy review required before public release	
Name/Org: <u>Joe Smith /12347</u>	Date: <u>12/25/04</u>
Guidance (if applicable) _____	



WebShippers

Specify Technical POC

- Export Determination (ITAR or ECCN)
- EC100 compliance
- Complete & accurate description
- Accurate piece count and value per item
- Specify if Sandia or recipient will clear Customs duties, taxes, etc. at destination





Handcarries

- International Handcarry Form
- Temporary Export
- Items to be taken and brought back on same trip!!
- WebShipper required for **permanent** export of handcarried items.
- No Exceptions!!
- Prior to final disposition

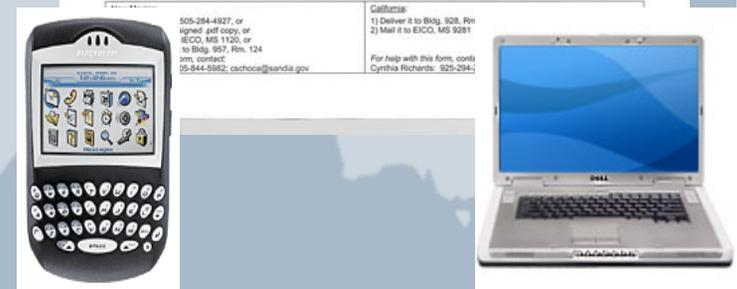
SP 6001-IMP (9-2005) Supplement (11-2002) (Rev)

COMMERCIAL INVOICE
Sandia National Laboratories
International Handcarry Form

This form is to be used for TEMPORARY EXPORTS ONLY. For permanent exports complete a WebShipper.

Sandia National Laboratories 1515 Eubank SE Albuquerque, NM 87123	Site: Albuquerque, NM	Date Prepared: Departure Date: Return Date:
Purpose: <input type="checkbox"/> Business <input type="checkbox"/> Personal Travel	Requester: City:	Return via Intermittent Mail MS
Destination: (Enter company or organization being contacted or name of conference being attended, city and country for all sites to be visited. For personal travel only, enter hotel names or other places where you will be staying). DO NOT USE ACRONYMS/ABBREVIATIONS.		
Description: (For each item to be handcarried, enter brand name, country of origin, model#, serial#, Sandia property #, and all software (installed or uninstalled). List software that is part of the Sandia Common Operating Environment as SNL COE. Specify if any software was developed by SNL. Enter LAST ITEM after the last item.		
HTSN: 9801.00.8500/FREE		
I certify that: 1) The item(s) I am handcarrying is unclassified and non-hazardous; 2) these items and/or software will remain under my effective control at all times; 3) these items and/or software will be returned to the United States upon completion of my foreign travel; and 4) any technologies/data/information that will be shared with any foreign party have been reviewed and approved for such export. I understand that failure to comply with these conditions may constitute a violation of U.S. Export Regulations and/or subject me to disciplinary action.		
Requestor's Signature: _____		Date: _____
<input type="checkbox"/> TMP <input type="checkbox"/> GOV <input type="checkbox"/> NLR <input type="checkbox"/> Other (Specify) _____		
Export Control Analyst (Approved by): _____		Date: _____
TEMPORARY EXPORT, TOOLS OF THE TRADE, NO SED REQUIRED PER 15 CFR 30.56(B) AMENDED These commodities, technologies, or software were exported from the United States in accordance with the Export Administration Regulations. Diversion contrary to U. S. Law is prohibited.		

INSTRUCTIONS: Return the signed and dated form to the Import/Export Control Office below for approval. Items SHALL NOT be exported from the United States until approval is received from the Import/Export Control Office.
ALLOW 5 BUSINESS DAYS FOR PROCESSING



Software



- Exporting Sandia developed software
 - Configuration (version) Control
 - Intellectual property/copyright issues
- Exporting other Lab developed software



Procurement Clauses

13 Individual International Commercial Terms (INCOTERMS) 2000. We selected three:

- 🌐 **FCA** (+ the named point of departure) - Free Carrier
- 🌐 **DDU** (+ the named point of destination) - Delivered Duty Unpaid
- 🌐 **DDP** (+ the named point of destination) - Delivered Duty Paid

We also revised FOB Destination and FOB Origin for US Shipments





Import/Export Control Questions

Got Questions?

